

Reagan E. Bradford, OBA #22072\*

Ryan K. Wilson, OBA #33306\*

\*admitted *pro hac vice*

BRADFORD & WILSON PLLC

431 W. Main Street, Suite D

Oklahoma City, OK 73102

(405) 698-2770

(405) 234-5506 fax

reagan@bradwil.com

ryan@bradwil.com

**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF WYOMING**

Madeline A. Wright, on behalf of herself  
and all others similarly situated,

Plaintiff,

v.

Devon Energy Production Company, L.P.,

Defendant.

Civil Action No. 22-CV-213-KHR-SPK

---

**MOTION TO AUTHORIZE DISTRIBUTION OF SETTLEMENT FUNDS  
FOR PAYMENT OF EXPENSES**

---

Class Representative moves the Court to authorize the distribution of settlement funds from the expense reserve of the Gross Settlement Fund for reimbursement of Litigation Expenses and Administration, Notice, and Distribution Costs.<sup>1</sup> In support of this Motion, Class Representative shows the Court the following:

---

<sup>1</sup> All capitalized terms not otherwise defined in this Motion shall have the same meanings ascribed to them in the Settlement Agreement (Doc. 31-1).

1. On August 9, 2024, the Court entered its Order Granting Final Approval of Settlement, which approved the Settlement as fair, reasonable, and adequate under Rule 23. Doc. 43 at 7, ¶ 8.

2. On the same day, the Court also entered its Order Awarding Plaintiff's Attorneys' Fees, Litigation Expenses, Administration, Notice, and Distribution Costs, and Case Contribution Award. Doc. 44 (the "Fee and Expense Order").

3. The Fee and Expense Order provided a reserve of \$105,160.93 for future Litigation Expenses and Administration, Notice, and Distribution Costs. *Id.* at 9, ¶ 6(h).

4. Following entry of the Fee and Expense Order, Class Counsel has advanced \$46,773.86 in Litigation Expenses and Administration, Notice, and Distribution Costs. *See Ex. 1*, Declaration of Class Counsel at 1, ¶ 1.

5. Following entry of the Fee and Expense Order, the Settlement Administrator (JND Class Action Administration) has incurred \$11,803.73 in Administration, Notice, and Distribution Costs. *Id.* at 1, ¶ 2.

6. In total, Class Counsel and the Settlement Administrator have incurred \$58,577.59 in Litigation Expenses and Administration, Notice, and Distribution Costs, which costs were reasonably and necessarily incurred and advanced to effectuate the Settlement and to distribute the Net Settlement Fund to Class Members in accordance with the Court's orders. *Id.* at 1, ¶ 3.

7. Accordingly, Class Counsel requests that the Court authorize distribution of \$58,577.59 to Class Counsel and the Settlement Administrator to reimburse, respectively, the advanced costs, which amount is within the reserve established by the Court in the Fee and Expense Order (\$105,160.93).

8. A proposed order will be submitted under the Court's Local Rules.

Respectfully Submitted,

/s/ Reagan E. Bradford

Reagan E. Bradford, OBA #22072\*

Ryan K. Wilson, OBA #33306\*

\*admitted *pro hac vice*

BRADFORD & WILSON PLLC

431 W. Main Street, Suite D

Oklahoma City, OK 73102

(405) 698-2770

(405) 234-5506 fax

reagan@bradwil.com

ryan@bradwil.com

~~—and—~~

Rick Erb 6-2663

RICHARD A. ERB, JR., PC

PO Box 36

Gillette, WY 82717

(307) 682-0215

(307) 682-1339 fax

rick@rickerb.com

**COUNSEL FOR PLAINTIFF**

### **CERTIFICATE OF SERVICE**

I hereby certify that on March 27, 2025, a true and correct copy of the above and foregoing document was served in accordance with the Local Rules on all counsel of record via the Court's electronic filing system.

/s/ Reagan E. Bradford

Reagan E. Bradford